

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DIRECT SOURCE SEAFOOD LLC, a
Washington limited liability company,

Plaintiff,

v.

AQUA STAR (USA) CORP., a Washington
corporation; and DOES 1-20, inclusive,

Defendants.

Case No. 2:16-cv-00407-RSL

~~PROPOSED~~ PERMANENT INJUNCTION
AGAINST DEFENDANT AQUA STAR
(USA) CORP.

ALLEGATIONS AND CLAIMS OF THE PARTIES

1. Plaintiff Direct Source Seafood LLC ("DSS") is a Washington-based seafood importer and wholesaler. DSS owns: (a) a federal registration for the CHEF'S NET mark for seafood, Registration No. 3,469,004, issued on July 15, 2008; (b) a federal registration for the CHEF'S NET mark and design for seafood, Registration No. 5,054,548, issued on October 4, 2016; and (c) a federal registration for the CHEF'S NET mark and design for seafood, Registration No. 5,080,845, issued on November 15, 2016 (collectively, the "CHEF'S NET Marks"). DSS's two registered CHEF'S NET design marks are shown below:



1 1. From using the CHEF'S NET Marks or any reproduction, counterfeit, copy or
2 colorable imitation thereof in commerce in connection with the manufacture, importation,
3 distribution, advertisement, offer for sale and/or sale of seafood;

4 2. From shipping, delivering, distributing, transferring or otherwise moving,
5 disposing of, selling or attempting to sell any seafood products bearing the CHEF'S NET Marks,
6 or any reproduction, counterfeit, copy or colorable imitation thereof; and

7 3. From assisting, aiding or attempting to assist or aid any other person or entity in
8 performing any of the prohibited activities referenced in (1) to (2) above.

9 **BINDING EFFECT**

10 IT IS FURTHER ORDERED that this Permanent Injunction shall be binding upon and
11 inure to the benefit of the parties and all successors, assigns, parent entities, subsidiaries,
12 officers, directors, members, shareholders, distributors, agents, affiliates, and all other persons
13 who are in active concert or participation with anyone described herein, who receive actual
14 notice of this Permanent Injunction by personal service or otherwise.

15 **RETENTION OF JURISDICTION**

16 IT IS FURTHER ORDERED that the Court shall retain jurisdiction of this action for
17 purposes of construing, modifying, and enforcing this Permanent Injunction.

18 IT IS SO ORDERED.

19 Dated this 28th day of March, 2017.



20 ROBERT S. LASNIK
21 UNITED STATES DISTRICT JUDGE
22
23
24
25
26
27